

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: : Case No. 5:24-bk-03055-MJC  
JOSLYN RENEE RINKER, :  
Debtor : Chapter 7

**APPLICATION TO EMPLOY ATTORNEY**

**TO THE HONORABLE MARK J. CONWAY, BANKRUPTCY JUDGE:**

The application of Lawrence G. Frank respectfully represents:

1. On the 26<sup>th</sup> day of November 2024, applicant was appointed trustee in the above-captioned matter.
2. Applicant wishes to employ Lawrence G. Frank, Esquire, as of the date of his appointment as trustee, as an attorney duly admitted to practice in this Court. Applicant has selected Lawrence G. Frank, Esquire, for the reason that Lawrence G. Frank has had considerable experience in bankruptcy matters, and applicant believes that Lawrence G. Frank is well qualified to represent him in this proceeding. Under Section 327(d) of the Bankruptcy Code, the trustee may act as attorney for the estate if it is in the best interest of the estate for him to do so.
3. The professional services that Lawrence G. Frank, Esquire, is to render are, among others, the following:
  - (a) to assist the Trustee in protecting the rights of unsecured creditors in a possible equitable distribution or settlement award;
  - (b) to review claims to determine their validity;
  - (c) to handle any and all legal problems which may arise during the course of the administration of the estate.
4. The proposed billing rate for the attorney for the trustee will be \$400.00 an hour plus costs for services rendered during calendar year 2025.

5. To the best of applicant's knowledge, Lawrence G. Frank, Esquire, has no connection with the Debtor, her creditors or any other party in interest, and represents no interest adverse to the trustee of the estate in matters upon which he is to be engaged, and his employment would be in the best interest of the estate.

**WHEREFORE**, applicant prays that he be authorized to employ Lawrence G. Frank, Esquire, as his attorney under a general retainer.

Respectfully submitted,

/s/ Lawrence G. Frank, Esquire

Lawrence G. Frank, Esquire  
Attorney ID No.: 15619  
100 Aspen Drive  
Dillsburg, PA 17019  
PH: (717) 234-7455  
[lawrencegfrank@gmail.com](mailto:lawrencegfrank@gmail.com)

Trustee in Bankruptcy

IN THE UNITED STATES BANKRUPTCY COURT  
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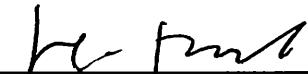
**AFFIDAVIT OF PROPOSED ATTORNEY**

COMMONWEALTH OF PENNSYLVANIA :  
: SS  
COUNTY OF YORK :  
:

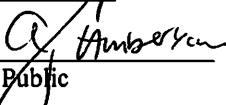
I, Lawrence G. Frank, Esquire, hereby make solemn oath:

1. I am an attorney and counselor-at-law duly admitted to practice in the Commonwealth of Pennsylvania, and in the United States Bankruptcy Court for the Middle District of Pennsylvania.
2. I maintain an office for the practice of law at the Law Office of Lawrence G. Frank, 100 Aspen Drive, Dillsburg, PA 17019.
3. I have no connection with Joslyn Renee Rinker, the above-named Debtor, her creditors or any party in interest herein, or their respective attorneys.
4. I represent no interest adverse to the Debtor or her estate in the matters upon which I am to be engaged.

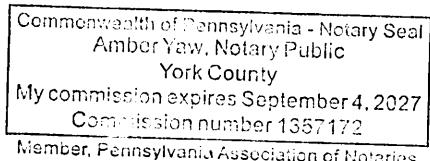
5. I am a disinterested person within Section 101(14) of the Bankruptcy Code.

  
\_\_\_\_\_  
Lawrence G. Frank, Esquire

Sworn to and subscribed  
to me this 25<sup>th</sup> day  
of January, 2025

  
\_\_\_\_\_  
Notary Public

My Commission Expires: 09/04/2027



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**CERTIFICATE OF SERVICE**

I hereby certify that on the 28<sup>th</sup> day of January 2025, I electronically filed the foregoing *Application to Employ Attorney* with the Clerk of the Bankruptcy Court by using the CM/ECF system which sent notification of such filing to the following filing user at the following email address:

U.S. Trustee: [ustpregion03.ha.ecf@usdoj.gov](mailto:ustpregion03.ha.ecf@usdoj.gov)

LAW OFFICE OF LAWRENCE G. FRANK

/s/ Lawrence G. Frank, Esquire

Lawrence G. Frank, Esquire  
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100 Aspen Drive  
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Trustee in Bankruptcy